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UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

RENÉ QUIÑONEZ and MOVEMENT INK LLC,)	Case No. 3:22-CV-03195-WHO
Plaintiffs,)	
v.)	DECLARATION OF
)	MICHAEL A. KEOUGH
UNITED STATES OF AMERICA, <i>et al.</i> ,)	
Defendants.)	

I, Michael A. Keough, declare as follows:

1. I am an Assistant United States Attorney and represent the United States of America in the above captioned matter. I am a member in good standing of the State Bar of New York. The matters stated in this declaration are true of my own knowledge, and if necessary, I could and would competently testify to them.

2. Attached hereto as Exhibit 1 is a true and correct copy of an excerpt from the deposition of René Quiñonez, taken on June 5, 2024.

I declare under penalty of perjury under the laws of the United States that the above is true and accurate. Executed this 4th day of October, 2024, in Oakland, California.

DATED: October 4, 2024

Respectfully submitted,

ISMAIL J. RAMSEY
United States Attorney

/s/ Michael A. Keough
MICHAEL A. KEOUGH
Assistant United States Attorney

Attorneys for the United States of America